

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Superior Barrel and Drum - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region II**

**Subject:** **POLREP #14**  
**Acid and Base Composite Samples Collected**  
**Superior Barrel and Drum**

**Elk, NJ**  
**Latitude: 39.6930670 Longitude: -75.1345550**

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**From:** Keith Glenn, OSC/Environmental Scientist

**Date:** 12/15/2013

**Reporting Period:** December 9, 2013 through December 15, 2013

**1. Introduction**

## 1.1 Background

<b>Site Number:</b>	A23K	<b>Contract Number:</b>	EP-S2-10-01
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	11/22/2013
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/30/2013	<b>Start Date:</b>	9/27/2013
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NJD986630705	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	8/29/2013
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

### 1.1.1 Incident Category

A Removal Action is required to identify remaining hazardous materials that are on-Site and properly contain and dispose of such.

### 1.1.2 Site Description

On August 29, 2013 the New Jersey Department of Environmental Protection (NJDEP) notified the United States Environmental Protection Agency (EPA) Region 2 Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site. NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Observed were thousands of containers, mostly 275-gallon totes and 55-gallon drums, located along a public road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in various locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, however most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, oxidizer, and non-hazardous material.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

#### 1.1.2.1 Location

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5-acre property. The entrance to the facility is down a dirt road. The north end of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested property. To the south are private lands which are also densely wooded with several marshy areas. The western boundary is State Route 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Lane, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is where the permanent steel structure is located. This area would receive containers, rinse the containers, and recondition them for future market. This area is approximately 2.4 acres with containers located throughout. The additional operational area appears to be mainly for storage of full 275-gallon totes and 55-gallon drums, with

several trailers holding containers. This area encompasses approximately .32 acres of land. Both areas show signs of impact from leaking containers or dumping of materials.

#### **1.1.2.2 Description of Threat**

The facility is located in a federally recognized wetland. Thousands of containers are in various conditions of deterioration and leaking containers have been noted. Many labels on containers indicate contents of hazardous substances, however the property owner and his attorney have stated that the drums are of unknown contents. The facility is unsecured with access from a public road and surrounding trails. Shot-gun shells from target practice on containers are evidence of trespassers, along with signs of vandalism.

Companies that are located in the immediate area, along Jacob Harris Lane, are on private water wells. Residential properties located along Whig Road (<1/4 mile away) and Aurora Road (<1/2 mile) are also on private well water.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

NJDEP collected samples from four (4) random containers, all 55-gallon drums. Field screening tests were conducted on them using Photoionization Detectors, HazMat ID, pH, flash point, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers.

A Removal Assessment was completed on September 27, 2013. Approximately 252 containers were opened and aliquots were collected for HazCat. Field laboratory results indicated the presence of hazardous characteristics. Samples were collected from select drums and totes where they were shipped to NELAC accredited laboratories. Analytical results showed toluene, benzene, TCE, PCBs, lead, and many other hazardous substances make up the contents of the containers. Soil samples also showed attribution between the materials in the containers and that in the soil.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

During the operational period activities focused on constructing the warming cells, organizing containers into designated areas by waste stream, and collecting composite samples for laboratory analysis.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office, HazMat Team, NJDEP, U.S. Fish and Wildlife, and local officials. NJDEP personnel continued weekly visitations and communication with Elk Township officials also continued. Security personnel continued to patrol the Site during non-operational hours.

#### **2.1.2 Response Actions to Date**

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

On December 9, 2013 seven (7) samples were sent to the laboratory for analysis. Five (5) of these samples were grab samples from containers that exhibit unique features and were determined to not eligible for bulking. The remaining were composite samples made up of numerous containers. All samples were from the acid waste stream. On December 11, 2013 nine (9) samples were sent to the laboratory for analysis of which six (6) were composite samples from various containers. All samples were from the acid waste stream. On December 13, 2013 sixteen (16) samples were sent to the laboratory for analysis. Thirteen of these samples were caustic materials, of which eleven (11) were composites. Three (3) samples were collected from acidic solutions which completes the sample collection for all materials in the acid waste stream.

By December 13, 2013 approximately 80% of the construction for the warming cells was completed. The cell designated for the laboratory was completed and all aliquots were moved into this location. A bulking area was designated in an area with additional ventilation for safety reasons.

On December 13, 2013 the investigative reporter for CBS 3 Philadelphia returned to the Site for taking additional photos and video for an upcoming story.

RST continued to provide perimeter and spot air monitoring to ensure the safety of personnel and surrounding properties. Additionally RST continued to manage the SCRIBE and Response Manager databases.

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. To date, no response was received from Thomas Toy. Because of this, ORC has drafted a Notice and Demand Letter to Superior Barrel. Personnel are awaiting receipt of the SCORPIOS report prior to sending the Demand Letter.

Enforcement personnel generated a list of potential arrangers based on information collected from labels and on-site paperwork. EPA reviewed the companies and will send 104(e) information request letters to those that may have generated or transported hazardous waste.

### 2.1.4 Progress Metrics

Waste Stream	Sub-Class	Composite Samples Collected	Amount of Containers in Composite
<b>Neutral</b>			
	N1	1	35
	N2	0	-
	N3a	1	35
	N3b		-
	N4	0	-
	N5	0	-
	N6	0	-
	N7	0	-
<b>FLAMMABLE</b>			
	F1	1	33
	F2	0	-
	F3	0	-
	F4	0	-
	F5	0	-
	F6	0	-
	F7	0	-
	F8	0	-
<b>ACID</b>			
	A1a (pH=4; low viscosity)	1	12
	A1b (pH=4; high viscosity)	1	10
	A1c (pH=3)	1	11
	A1d (Acidic Solids)	1	5
	A1e (pH=1)	1	3
	A1f (pH=2)	1	7
	Grab (difference in properties prevent from bulking)	8+3 = 11	*
	A2a (pH=3-4)	1	11
	A2b (pH=3-4)	1	12
<b>BASE</b>			
	B1a	1	2

	B1b	1	2
	B1c	1	2
	B1d	1	8
	B1e	1	4
	B1f	1	7
	B1g	1	7
	B1h	1	5
	B1i	1	7
	B1j	1	4
	B1k	1	9
	Grab (difference in properties prevent from bulking)	2	*

The following table will be completed once transport and disposal operations begin.

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County, and local officials will continue throughout the removal activities of the Superior Barrel and Drum Site.

During the next operational period personnel will complete the construction of the warming cells inside the building. Additional composite samples will be collected for analysis. Containers will continue to be moved into areas designated by waste stream.

The Site will be closed for the Christmas and New Year holidays following close-of-business December 20, 2013 and will resume on January 6, 2014. 24-Hour security will be posted during this time.

#### 2.2.1.1 Planned Response Activities

During the next operational period field crews will continue to segregate materials into appropriately designated areas based on hazard class. This will create a more organized operation. Personnel will also complete the construction of the warming cells. Propane heating services will be procured to provide warmth to the cells.

Field chemists and T&D coordinators will continue to develop the bulking schemes based on waste class. Personnel will re-visit the neutral waste stream and process materials with a HazMat ID. This will aid in determining any non-neutral materials that were not seen during the HazCat operations. In particular, composite samples previously collected for the N1 waste stream will be reviewed more closely to determine a better bulking strategy.

Additional action items that will be addressed include the propane tanks, waste removal, container destruction, inspection of potentially buried USTs and drums, and collection of additional multi-media samples.

### 2.2.2 Issues

None to report.

## 2.3 Logistics Section

All logistical issues are being handled by EPA Region 2, RST personnel or ERRS personnel.

## 2.4 Finance Section

### 2.4.1 Narrative

On September 4, 2013, \$250,000 has been given to the Kemron ERRS contract to perform an emergency removal assessment.

On September 27, 2013, \$600,000 was verbally authorized for the commencement of a Removal Action.

On November 22, 2013 the Regional Administrator approved the Action Memorandum documenting the verbal authorization of funding allocation, 12- month exemption, and request for ceiling increase. The AM provides for a total rproject ceiling of \$4,080,000 of which 3,500,000 is for mitigation.

On December 2, 2013 EPA allocated an additional \$500,000 to the ERRS contractor for mitigation activities.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Assessment	\$250,000.00	\$243,066.00	\$6,934.00	2.77%
ERRS - Removal Action	\$990,946.00	\$430,780.00	\$560,166.00	56.53%
TAT/START - RV	\$200,000.00	\$121,994.00	\$78,006.00	39.00%
START - RA (Includ CLP)	\$200,000.00	\$201,451.00	(\$1,451.00)	-0.73%
<b>Intramural Costs</b>				
USEPA - Direct	\$4,430,000.00	\$0.00	\$4,430,000.00	100.00%
USEPA - InDirect	\$1,445,509.00	\$0.00	\$1,445,509.00	100.00%
<b>Total Site Costs</b>	<b>\$7,516,455.00</b>	<b>\$997,291.00</b>	<b>\$6,519,164.00</b>	<b>86.73%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Safety Officers have been identified through RST and ERRS. Health and Safety Plans have been completed by each contractor. Daily tailgate briefings are conducted.

From October 16 - 18, 2013 a Kemron Industrial Hygienist visited the Site and conducted a health and safety audit. Comments were addressed in the field and a report was generated on November 12, 2013. EPA conducted a health and safety audit on November 5, 2013. All recommendations were

addressed following the report generated on November 6, 2013.

### **2.5.2 Liaison Officer**

The OSC is acting Liaison Officer with local, State, and County officials.

### **2.5.3 Information Officer**

Sophia Kelley has been designated as the Community Involvement Coordinator for the Superior Barrel and Drum Site. Ms. Kelley can be reached at 212-637-3670. Elias Rodriguez is the press coordinator and can be reached at 212-637-3664. Christopher Sebastian is the inter-governmental liaison and can be reached at 212-637-3597. George Zachos is the Regional Public Liaison and can be reached at 1-888-BUDSMAN.

A Community Update was approved by PAD on October 23, 2013.

Public Affairs and the OSCs are working together to generate a more robust and up-to-date external website highlighting removal operations.

## **3. Participating Entities**

### **3.1 Unified Command**

Unified Command is currently not being used.

### **3.2 Cooperating Agencies**

EPA is coordinating efforts with various entities that have proven to be extremely helpful in the success of this project, including but not limited to:

- NJDEP
- Gloucester County HazMat Team and Department of Emergency Response
- Gloucester County Fire Marshal and Fire Department
- Police Department
- Glassboro Water Department
- Elk Township

## **4. Personnel On Site**

EPA (1)

RST Contractors - Weston Solutions (1)

ERRS Contractors - Kemron (12)

## **5. Definition of Terms**

**Assisting and Cooperating Agencies** - Agencies who are assisting the EPA response, but are not a part of Unified Command.

**CERCLA** - Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. Section 9601).

**E Goods** - Electronic machines which contain hazardous components.

**Emergency Response** - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

**EPA** - United States Environmental Protection Agency

**ERRS** - Emergency and Rapid Response Services contract.

**FRP** - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil. Required by certain facilities that store and use large quantities of oil.

**FWS or U.S. FWS** - United States Fish and Wildlife Service.

**HazCat** - Hazardous Categorization, a field technique which utilizes a series of chemical tests on samples collected in the field (aliquots) to determine the characteristics of hazardous and non-hazardous substances. The characteristics which can be determined include matrix (material state), solubility, combustibility, flammability, pH and the presence of oxidizers, peroxides, sulfides, PCB, cyanide.

**Hazardous Debris** - Debris which contains compounds that make it inappropriate for municipal landfill disposal

**Household Hazardous Waste** - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

**Monitoring** - Using equipment which will give limited real-time information about constituents in environmental media. This method is used most often for air and water testing.

**NELAC** - National Environmental Laboratory Accreditation Conference.

**NJDEP** - New Jersey Department of Environmental Protection.

**OSC** - Federal On-Scene Coordinator.

**OSHA** - Occupational Safety and Health Administration.

**PCBs** - Polychlorinated biphenyls, a class of chemical compounds.

**PPE** - Personal protective equipment.

**PRP** - Potentially Responsible Party.

**RCRA** - Resource Conservation and Recovery Act.

**REOC** - EPA Region II Regional Emergency Operations Center.

**RMP** - Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

**RST** - Removal Support Team contract.

**Sampling** -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

**Small Container** - any container with a potential capacity of less than 5 gallons.

**TRI** - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

**TCE** - Trichloroethylene.



**Unified Command** - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional responsibilities.

**White Goods** - Large home electronics such as refrigerators, washing machines, and dryers.

**WW** - Wastewater Treatment Facilities.

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

[www.epaosc.org/SuperiorBarrelAndDrum](http://www.epaosc.org/SuperiorBarrelAndDrum)

<http://www.epa.gov/region2/superfund/removal/superiorbarrel/>

### **6.2 Reporting Schedule**

At a minimum, POLREPS will be generated on a weekly basis. Should emerging situations need to be provided to parties, spot reports or bulletins will be sent via email.

As of September 26, 2013 daily updates were no longer provided.

## **7. Situational Reference Materials**

[www.epaosc.org/SuperiorBarrelAndDrum](http://www.epaosc.org/SuperiorBarrelAndDrum)

[www.epa.gov/region2/superfund/removal/superiorbarrel/](http://www.epa.gov/region2/superfund/removal/superiorbarrel/)